

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANGEL TORRES,)	
Plaintiff,)	
)	
vs.)	
)	
CITY OF CHICAGO,)	
a municipal corporation,)	
OFFICER JERRY DOSKOCZ, Star #6573,)	08 CV 00282
a Chicago Police Officer,)	
in his individual capacity,)	Judge Kendall
OFFICER KENNETH FLAHERTY, Star #13584,)	
a Chicago Police Officer,)	Magistrate Denlow
in his individual capacity,)	
CHICAGO POLICE OFFICER JOHN DOE #1,)	
Star number unknown,)	
in his individual capacity,)	
CHICAGO POLICE OFFICER JOHN DOE #2,)	
Star number unknown,)	
in his individual capacity,)	
)	
Defendants.)	

AGREED MOTION TO EXTEND DISCOVERY

NOW COMES Plaintiff, by and through his attorneys, DVORAK, TOPPEL & BARRIDO, LLC., and states the following in support of this agreed motion to extend discovery:

1. This action arises from events occurring in Chicago on January 26, 2007, involving Plaintiff and several Chicago Police Officers.
2. Plaintiff alleges he was illegally detained and arrested by Defendants Flaherty and Daskocz before being physically abused by unknown Chicago Police Officers at Mercy

Hospital, where Plaintiff was taken to be treated for wrist pain, caused by the handcuffs in which he was restrained.

3. Following the scheduling order of this Court, the parties commenced discovery, which is currently slated to close on August 25, 2008.
4. To date, written discovery is complete; however, oral discovery has not yet begun, and the parties desire 90 days to complete all depositions.
5. Oral discovery did not begin because the identities of two Defendants were still unknown.

When the Independent Police Review Authority (IPRA) investigation was completed in early August 2008, the parties were able to discern the identities of the two unknown Defendants.

6. The purpose of the 90 day discovery extension will serve two functions. First and most obviously, it will permit the parties to complete all necessary depositions in this cause.

However, the parties hope this is not necessary, because, second, the parties are initiating formal settlement negotiations. Hence, the extension may result in settlement of this case, rather than serve to increase costs and fees.¹

WHEREFORE Plaintiff prays this Honorable Court grant this agreed motion to extend discovery and permit the parties an additional 90 days to complete oral discovery.

¹ Plaintiff will tender a formal demand letter to Defendants tomorrow, August 14, 2008. Clearly, if the parties are unable to settle this matter, Plaintiff will seek to amend the complaint to include the names of the now-known John Doe Defendants and initiate oral discovery forthwith.

Respectfully submitted,

s/ Brian J. Barrido

Brian J. Barrido,

One of the Attorneys for the Plaintiff.

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